

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS

KEVIN A. RODRIQUEZ, GLEN J. SMITH, EDGAR
B. PHILLIPS, LUIS A. "TITO"
MORALES AND V.I. DEMOCRATIC PARTY
Plaintiff,

v.

ST. THOMAS-ST. JOHN BOARD OF ELECTIONS,
JOINT BOARD OF ELECTIONS, MYRON
JACKSON, in his capacity as President of the 32nd
Legislature, and the 32nd Legislature of the US Virgin
Islands.

Defendants.

CIV NO. 3:17-CV-0044-CVG-
RM

ACTION FOR VIOLATION
DECLARATORY AND
INJUNCTIVE RELIEF
(PENDENT LITE AND
PERMANENT)

**DEFENDANT GOVERNMENT OF THE VIRGIN ISLANDS' MOTION TO DISMISS
AMENDED COMPLAINT**

COMES NOW, Defendant, Government of the Virgin Islands (GVI), by and through its undersigned counsel, and pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, and respectfully hereby moves this Honorable Court to dismiss Plaintiffs' Amended Complaint against the GVI, for all the reasons set forth in the accompanying memorandum filed herewith.

WHEREFORE, Defendant GVI respectfully requests that the Court dismiss this matter with prejudice.

Date: July 10, 2017

CLAUDE E. WALKER, ESQ.
ATTORNEY GENERAL

By: /s/ *SHEENA CONWAY*

Sheena Conway, Esq.
VI Bar No. 423
Assistant Attorney General
Virgin Islands Department of Justice
GERS Complex, 2d Floor
34-38 Kongens Gade

St. Thomas, VI 00802
340.774.5666
sheena.conway@doj.vi.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed using the CM/ECF which will send a notification of such filing on July 10, 2017 to the following:

Kevin A. Rodriquez
Krod655@gmail.com

Vincent Frazer, Esq.
Law Offices of Pedro Williams
vincent.frazer@pkwilliamslaw.com

/s/ Sheena Conway
SHEENA CONWAY